

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

In Re:	)	
	)	
MICHAEL JOHN MOHR	)	Bk. No.
CHRYSTAL RENE MOHR	)	Chapter 13
Debtor(s)	)	

**CHAPTER 13 PLAN**

COMES NOW, the Debtors, Michael John Mohr and Chrystal Rene Mohr (hereinafter “Debtors”) in the above bankruptcy proceeding and pursuant to the 1322 of Title 11, United State (the “Bankruptcy Code”), propose the following plan:

**I      Plan Funding**

Pursuant to 1325 9b) (1) of the Bankruptcy Code, the Debtors shall submit and pay to the Trustee their disposable income for a period of 60 months, under the following payment schedule.

**II      Plan Duration and Payments**

Debtor shall make payments of \$3,813.00 for duration of the 60 month plan.

**III      Treatment of Claims**

<b>Priority Claims</b>		
Claims entitled to priority 507 of the U.S. Bankruptcy Code		
<b>Creditor</b>	<b>Amount Owed</b>	<b>Repayment Plan</b>
Attorney Fees	\$3,500.00	Prorated
Internal Revenue Services	\$31,028.00	Prorated
Oklahoma Tax Commission	\$1,564.00	Prorated

<b>Mortgage Claims</b>					
<b>Creditor</b>	<b>Collateral</b>	<b>Payment</b>	<b>Arrearage</b>	<b>% Rate</b>	<b>Claim of Treatment</b>
PHH Mortgage Services Merrill Lynch	1 <sup>st</sup> Mortgage: Homestead: 3905 N Creek Bank Rd Edmond, OK	\$2,029.84	\$19,369.58	2.1250%	Ongoing mortgage and arrearage to be paid through the plan.
Bank of America	2 <sup>nd</sup> Mortgage: 3905 N Creek Bank Rd Edmond, OK	\$494.25	\$2,948.56	4.750%	Ongoing mortgage and arrearage to be paid through the plan.

<b>Secured Claims</b>				
<b>Creditor</b>	<b>Collateral</b>	<b>Claim Amount</b>	<b>Interest Rate</b>	<b>Payment</b>
Toyota Financial Services	2011 4Runner	\$1,279.73		Pay outside the plan.

## **Unsecured Claims**

Unsecured creditors, timely filing a valid Proof of Claim will be paid a base amount of the outstanding balance owed.

### **IV Liquidation Analysis**

The monies distributed under the plan to creditors with an allowed claim, will be paid no less than the amount that would be paid on such claim if the Debtor(s) estate were in a Chapter 7 proceeding.

#### **1. Plan Confirmation**

As stated in the Order and Notice of Meeting of Creditors, this plan may be confirmed immediately following the §341 meeting of creditors.

#### **2. Reinvestment of Property in the Debtors**

Pursuant to §1327 (b) of the Bankruptcy Code, upon confirmation, all property shall remain property of the estate and shall not reinvest in the Debtor(s) until the Debtor(s) has/have received a discharge of all debts as provided for in the Plan.

#### **3. Executory Contracts**

Any contracts not specifically assumed herein are hereby rejects

#### **4. Effective Date**

The Effective date of the Plan shall be the date of the entry of the Order Confirming the Plan.

#### **5. Claims**

Creditor failing to timely file a proof of claim will receive no distribution under the Plan, and those debts will be discharged

#### **6. Discharge**

Upon completion of his Plan, the Debtor(s) will be discharged from all debts provided for unless otherwise specified herein, pursuant to §1325 of the Bankruptcy Code.

/s/ Kenneth L. Spears

/s/Michael John Mohr

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MICHAEL JOHN MOHR

/s/ Chrystal Rene Mohr

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CHRYSTAL RENE MOHR